

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY	
<b>Caption in compliance with D.N.J. LBR 9004-2(c)</b>	
E. RICHARD DRESSEL, ESQUIRE (ED1793) LEX NOVA LAW, LLC 10 East Stow Road, Suite 250 Marlton, NJ 08053 (856) 382-8211 Attorneys for T.J. McDermott Transportation Co., Inc., Debtor in Possession	
In Re:	Case No.: <u>22-17912(JNP)</u>
T.J. McDermott Transportation Co., Inc.,  Debtor.	Chapter: <u>11</u>
	Judge: <u>Jerrold N. Poslusny, Jr.</u>

**MOTION OF DEBTOR TO VOLUNTARILY CONVERT CHAPTER 11 CASE  
TO CASE UNDER CHAPTER 7**

I Leeanna Roman Lozado, of full age, do hereby certify that:

1. I am the President of T.J. McDermott Transportation Co., Inc. (the “Debtor”), and I make this Certification in Support of the Debtor’s Motion to Voluntarily Convert Chapter 11 Case to Case Under Chapter 7 (the “Motion”).

2. The Debtor is no longer able to comply with its post-petition financial obligations and is unable to propose a feasibility Chapter 11 Plan of Reorganization.

3. The Debtor has ceased all operations as of December 9, 2022.

4. The Debtor qualifies as a debtor under Chapter 7 of Title 11.

5. Under 11 U.S.C. Section 1112(a), the Debtor is entitled to convert its Chapter 11 case to a case under Chapter 7 at any time, and the Debtor now wishes to convert its Chapter 11 case to a case under Chapter 7.

6. A copy of this notice will be served upon the Office of the United States Trustee and the Subchapter V Trustee, all secured creditors and parties who have entered their appearance in this case.

**WHEREFORE**, the Debtor, under Bankruptcy Rules 1017(d) and 9013, hereby gives notice of the conversion of this Chapter 11 case to a case under Chapter 7 of Title 11, United States Bankruptcy Code.

I declare under penalty of perjury that the above is true and correct to the best of my knowledge, information, and belief.

Dated: December 9, 2022

/s/ Leeanna Roman Lozado  
LEEANNA ROMAN LOZADO, PRES.